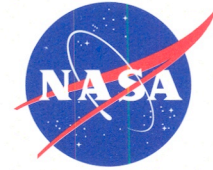


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



November 14, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the American Museum of Natural History Reception and Dinner on November 14, 2011

On November 14, 2011, the American Museum of Natural History, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a reception and dinner in the American Museum of Natural History, in New York, New York, at 6 PM.

The event will include an exhibit "Beyond Planet Earth: The Future of Space Exploration." Approximately 300 people have been invited to attend, including NASA personnel, State and local officials, museum trustees, academia, the media, representatives of the aerospace industry and the general public. The estimated cost of the event, including all food and beverages, is \$150 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. The event features Adam Riess, the winner of the 2011 Nobel Prize in Physics. Special guests include Nobel Laureate John Mather and Astronauts from the STS125 Hubble Repair Mission. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

Moreover, NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Kathleen T. Spear

for Adam F. Greenstone